

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	NO. 3:23-CR-301
	:	
PAUL HELRING,	:	(JUDGE MARIANI)
	:	
Defendant	:	
	:	ELECTRONICALLY FILED

MOTION TO MAKE PAYMENT OF RESTITUTION

Defendant Paul Helring, by and through his undersigned counsel, hereby requests entry of an Order authorizing the Clerk of Court to receive his payment of restitution on or before Friday, May 31, 2024, and in support thereof, avers as follows:

1. On November 19, 2023, Mr. Helring executed a Plea Agreement pursuant to which he is bound, *inter alia*, to pay full restitution in the amount of \$17,831.40. See Plea Agreement at ¶16 (ECF 3). At a hearing before Your Honor on January 25, 2024, the Court accepted Mr. Helring's guilty plea. (ECF 17).
2. Sentencing in this matter is scheduled before Your Honor on Tuesday, June 4, 2024.
3. In order to fully and promptly meet the obligations of the Plea Agreement, Mr. Helring seeks to place the restitution amount into the custody of the Clerk of Court on or before Friday, May 31, 2024.

4. Undersigned counsel has sought the concurrence of counsel for the Government in the foregoing Motion, and the Government concurs in the Motion.

WHEREFORE, Mr. Helring respectfully asks the Court to enter an Order in the form attached authorizing the Clerk of Court to receive the restitution payment in the amount of \$17,831.40 on or before Friday, May 31, 2024.

Respectfully submitted,

/s/ John B. Dempsey
John B. Dempsey
Patrick A. Casey
Myers, Brier & Kelly, LLP
425 Biden Street, Suite 200
Scranton, PA 18503

Jason J. Mattioli
The Mattioli Law Firm
425 Biden Street, Suite 300
Scranton, PA 18503

Date: May 29, 2024

Attorneys for Defendant, Paul Helring

CERTIFICATE OF CONCURRENCE

I, John B. Dempsey, hereby certify that I sought the concurrence of Assistant United States Attorney Jeffery St. John, Esquire, in this Motion. Mr. St. John concurs in this Motion.

/s/ John B. Dempsey
John B. Dempsey

Date: May 29, 2024

CERTIFICATE OF SERVICE

I, John B. Dempsey, hereby certify that I have served a true and correct copy of the foregoing Motion to Make Payment of Restitution upon the following parties via the Court's ECF system on this 29th day of May 2024:

Jeffery F. St. John, Esquire
U.S. Attorney's Office
Suite 311
235 North Washington Avenue
Scranton, PA 18503

/s/ Patrick A. Casey
Patrick A. Casey